

## **REMARKS/ARGUMENTS**

Amendments were made to the specification to correct errors and to clarify the specification. No new matter has been added by any of the amendments to the specification.

Claims 1-20 are pending in the present application. Claim 9 was canceled, and claims 1-8 and 10-20 were amended. Reconsideration of the claims is respectfully requested.

### **I. Examiner Interview**

Applicants appreciate the courtesies extended by the Examiner in the interview that was conducted on November 27, 2006. Applicants' claims were discussed. No agreement was reached.

### **II. 35 U.S.C. § 101: Claims 10-14**

The Examiner has rejected claims 10-14 under 35 U.S.C. § 101 as being directed towards non-statutory subject matter. Applicants have amended the specification to delete the language regarding transmission-type media; therefore, this rejection has been overcome and should be withdrawn.

### **III. Objection to Claims: Claim 7**

The Examiner has stated that claim 7 is objected to for an informality. Applicants have amended claim 7 to now depend from claim 6; therefore, this objection has been overcome and should be withdrawn.

### **IV. 35 U.S.C. § 103, Obviousness: Claims 1-20**

The Examiner has rejected claims 1-20 under 35 U.S.C. § 103 as being unpatentable over *Georgalas et al.*, Data Storage System Interface, U.S. Patent Publication No. 2005/0216498 A1 (September 29, 2005) (hereinafter "*Georgalas*") in view of *Davis et al.*, Systems and Methods for Managing Web Content and Behavior Rules Engine, U.S. Patent Publication No. 2004/0024888 A1 (February 5, 2004) (hereinafter "*Davis*"). This rejection, as it might be applied to the claims as amended, is respectfully traversed.

Applicants' independent claims describe providing an interface to validate transaction requests to access a database, using a plurality of validation criteria, from said plurality of clients having different requirements for said validation criteria, said interface in a singleton in-memory object; using said different requirements to determine whether to validate said transaction requests from said plurality of clients; and generating a database command that has a standard format in response to validated transaction requests, wherein said standard format database command is generated in response to a

validated transaction request regardless of which one of said plurality of clients sent said validated transaction request.

*Georgalas* teaches an interface between a client and one or more storage systems. *Georgalas* teaches a user interface that permits user configuration of the rule store. Each rule includes information relating to a handler program. The handler program is associated with one or more user requirements and is operable to interact with one or more storage systems. When a request is received that details a user requirement, the rule store is searched for a rule that is associated with the user requirement, and the handler program of the located rule is run to interact with the one or more storage systems.

*Georgalas* does not teach one interface that validates transaction requests to access a database using a plurality of validation criteria, where the transaction requests are from clients that have different requirements for the validation criteria.

*Georgalas* does not teach using different requirements to determine whether to validate transaction requests from clients.

*Georgalas* does not teach generating a database command that has a standard format in response to validated transaction requests, wherein said standard format database command is generated in response to a validated transaction request regardless of which one of said plurality of clients sent said validated transaction request.

Applicants' claims 2, 11, and 16 describe an interface that validates transaction requests to access a database using a plurality of validation criteria. The transaction requests are from clients that have different requirements for the validation criteria.

A first requirement is defined for first ones of the clients. The first requirement is for the first one of the validation criteria. According to the first requirement, transaction requests from the first ones of the clients are validated if the requests include data that is required for the first one of the validation criteria.

A second requirement is defined for second ones of the clients. The second requirement is also for the first one of the validation criteria. According to the second requirement, transaction requests from the second ones of the clients do not need data for the first one of the validation criteria in order to be validated.

If a transaction request from one of the second ones of the clients does not include data for the first one of the validation criteria, default data is determined. This default data is default data that has been specified for the second ones of the clients to use for the first one of the validation criteria. A database command is then generated that includes the default data in the one of the mandatory fields.

*Georgalas* does not teach if a transaction request from one of the clients does not include data for the first one of the validation criteria, determining default data that has been specified for the clients to

use for the first one of the validation criteria, where a database command is then generated that includes the default data in the one of the mandatory fields.

*Georgalas* does not teach associating a first one of said plurality of validation criteria with one of said plurality of mandatory fields, wherein data that is received for said one of said plurality of validation criteria is included in said one of said plurality of mandatory fields.

The Examiner relies on *Davis* to teach a rule manager that retrieves rules based on customer information. *Davis* does not teach the features that are absent from *Georgalas*. Therefore, the combination of *Georgalas* and *Davis* does not render Applicants' claims obvious because the combination does not teach or suggest the features of Applicants' claims.

The remaining claims depend from the claims discussed above and are patentable for the reasons given above. Therefore, the rejection of claims 1-20 under 35 U.S.C. § 103 has been overcome.

#### **V. Conclusion**

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: November 30, 2006

Respectfully submitted,

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